

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Case No. 20-mj-98 (HB)

IN THE MATTER OF THE SEARCH OF  
1185 CONCORD STREET N., SUITES  
228 AND 233, SOUTH ST. PAUL,  
MINNESOTA 55075

**MOTION TO UNSEAL**

The United States of America, by and through its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Joseph H. Thompson, Harry M. Jacobs, and Melinda A. Williams, Assistant United States Attorneys, hereby moves the Court for an order to unseal the case, including the Warrant, Application, and Affidavit of Postal Inspector John Western, in the above-referenced matter.

This motion is based upon the records and proceedings in this matter. Specifically, on February 14, 2020 and August 12, 2020, the government requested that the search warrant be sealed because public filing of these materials could alert the defendants to the investigation and result in their flight and destruction of evidence. Defendants have now been apprehended, or otherwise made aware of the charges in this case, the government no longer has flight and destruction of evidence concerns, and thus unsealing is warranted.

Dated: October 27, 2020

Respectfully submitted,

ERICA H. MacDONALD  
United States Attorney

BY: /s/ Joseph H. Thompson  
JOSEPH H. THOMPSON  
HARRY M. JACOBS  
MELINDA A. WILLIAMS  
Assistant U.S. Attorneys